

EXHIBIT A

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UBER TECHNOLOGIES, INC.,
RASIER, LLC, and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB

Judge: Honorable Charles Breyer

This Document Relates to:

ALL ACTIONS

**DECLARATION OF SCOTT BINNINGS
IN SUPPORT OF DEFENDANTS' BRIEF
REGARDING AUGUST 8, 2025
CLAWBACK PURSUANT TO SPECIAL
MASTER ORDER NO. 4, § III**

DECLARATION OF SCOTT BINNINGS

I, Scott Binnings, having personal knowledge of the following state:

1. I am the Associate General Counsel, Safety and Core Services, at Uber. I was first employed by Uber in April 2015 and have worked as in-house legal counsel for the past 10 years. My previous positions included Senior Counsel, Regulatory; Senior Counsel, Safety; Legal Director, Safety; Senior Legal Director, Safety; and Senior Legal Director, Safety, Payments, and Risk. In my current role, as has been the case throughout my tenure at Uber, I am responsible for providing legal advice to Uber's leadership and employees related to safety issues, procedures, and policy, among

DECLARATION OF SCOTT BINNINGS IN SUPPORT OF DEFENDANTS' BRIEF REGARDING AUGUST 8, 2025
CLAWBACK PURSUANT TO SPECIAL MASTER ORDER NO. 4, § III

Case No. 3:23-MD-3084-CRB


1 other legal advice. I offer this Declaration in the above-captioned matter in support of Defendants
2 Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's Brief Regarding August 8, 2025
3 Clawback Pursuant to Special Master Order No. 4 § III (ECF 2933). The facts set forth herein are
4 true and correct and are based on my own personal knowledge, and I could and would competently
5 testify thereto if called.

6 2. JCCP_MDL_PRIVLOG074265 is a confidential spreadsheet titled "Global-Safety
7 Risk Register Template – ATTORNEY-CLIENT PRIVILEGED." The Google Author is Sean
8 McIntyre, Director of Safety - APAC & EMEA. I was a collaborator on this document, along with
9 my colleagues, Amos Davis, then-Global Senior Counsel; Hannah Nilles, Director, Head of Safety –
10 Americas; and others. This spreadsheet tracked certain safety risks so that the company could
11 identify risk prevention and mitigation efforts. The goal of this document was to pull together
12 examples of risk frameworks that various teams within Uber had established over the years. This
13 was done to support the Uber safety team's establishment of an improved safety management system
14 and protocols for managing safety risk that the Operations team would follow globally, and spanning
15 all lines of business. As in-house counsel, I and Mr. Davis helped to develop this risk tracking
16 framework and provided legal guidance throughout its creation. In addition, we provided our legal
17 advice on certain areas of risks that were important to potential litigation and regulatory concerns.
18 This legal advice is reflected in redacted portions of the spreadsheet, including in the tab for "Risk
19 Matrix," "US&C Risk Tracker, and "Copy of US&C Risk Tracker." For example, Mr. Davis, who
20 reported to me at the time, was responsible for providing legal guidance on how to categorize certain
21 areas of risk. His work was performed at my direction and with my supervision, and his guidance is
22 directly reflected in the redacted portions of the spreadsheet.

23 I declare under penalty of perjury under the laws of the United States of America that the
24 foregoing is true and correct.

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Executed on August 22, 2025.

By: /s/ 
Scott Binnings